

Landin, Pam
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Pam Landin
340 La Mina
Ajo, AZ 85321

October 9, 2003

Dr. Jerry Pell
Fossil Energy
FE-27
US Department of Energy
Washington DC 20585

Dr. Pell:

Following are comments that I wish to submit in response to the Department of Energy's Tucson Electric Power Company Sahuarita-Nogales Transmission Line Draft Environmental Impact Statement (DOE/EIS-0336).

1 It is an impressive document that was obviously well researched and painstakingly developed. A question that was not addressed was the reason for the Western Corridor being chosen as the DOE's and TEP's preferred alternative. The Draft EIS shows
2 continued evidence that the Central Corridor is the more cost-effective, least detrimental, better alternative. The reasons listed for eliminating the Eastern Corridor from further analysis ("reasons of reliability, constructability...and visual impacts") are some of the same reasons that the Western and Crossover Corridors should not be preferred alternatives.

3 Construction expenses appear to be less for the Central Corridor than for the Western Corridor. According to the Draft EIS "the Central Corridor is shorter than the Western and Crossover Corridors." Fifty-six less support structures will be needed, cutting material and maintenance costs. Construction challenges exist in the Western Corridor as the transmission line crosses the Tumacacori Mountains, as well as in the Crossover Corridor where the transmission line will need to cross through the IRA of Peck Canyon. Construction in the Central Corridor bypasses the challenges presented by the mountainous areas.

4 The Central Corridor follows an already established utility corridor for almost 5 times the length of the Western Corridor (43 miles versus over 9). Roads have already been constructed along that corridor and rights of way have been established and only need to be extended. Geological, biological, and cultural surveys have already occurred on 43 of the 57.1 miles the Central Corridor will travel, as opposed to 9 of the 65.7 miles of the Western Corridor. Engineering issues and cultural, visual, and ecological resources have already been addressed and compromised with the construction of I-19 and the EPNG pipeline. The Central Corridor would ride the coattails of these previous developments rather than initiating the process anew for the Western Corridor.

Comment No. 1

While DOE identified the Western Corridor as its preferred alternative in Section 1.1 of the Draft EIS for the reasons cited, DOE accepted public comments on this designation and has taken these comments into account in the Final EIS. The Federal agencies made changes in the Final EIS where appropriate to include additional clarifications and analyses suggested by commentors on the Draft EIS. As stated in Section 1.4.1, in light of the Arizona Corporation Commission's (ACC) decision to site TEP's proposed line along the Western Corridor, DOE continues to identify the Western Corridor as DOE's preferred alternative. Refer to Section 1.1.2, The Origin of TEP's Proposal: TEP's Business Plan and the Proceedings of the Arizona Corporation Committee, of the Final EIS that provides background on TEP's selection of the Western Corridor as its preferred alternative.

Comment No. 2

The Eastern Corridor was eliminated from further consideration in this EIS because of TEP's conclusion that the Eastern Corridor is technically infeasible (see Section 2.1.5 for further discussion of elimination of the Eastern Corridor). The Western and Crossover Corridors remains a viable alternative for selection by the Federal decisionmakers. However, implementation of the proposed project in the Western or Crossover Corridors could not occur until TEP meets all regulatory requirements, including obtaining the necessary approval from the ACC.

Comment No. 3

The construction costs of each of the three action alternatives (the Western, Central, and Crossover Corridors) would be roughly similar (see Section 4.5.1). Section 4.5 analyzes the potential socioeconomic impacts that could result from the proposed project based on a number of factors including the cost of the proposed project. Any additional analysis of the cost of the proposed project is outside the scope of the EIS.

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5 The Draft EIS mentions that helicopters will be used to string conductors in all corridors. Helicopter use will be more of an issue in the Western and Crossover Corridors where it could adversely affect sensitive species or species of concern. Helicopter use will not be as much of an issue along the Central Corridor where there is already disturbance from existing development. The Draft EIS also mentions that explosives blasting may be used depending on geologic conditions. Again, this will be more of an issue along the Western and Crossover Corridors where there is more mountainous terrain and a potentially greater negative impact on wildlife due to the lesser amount of human disturbance that currently exists in the area.

7 The Western Corridor will affect a much longer area (almost 30 miles versus 15 miles) of pristine landscape than the Central Corridor. The Draft EIS even states that "the area of land that would have reduced Scenic Integrity as a result of construction and operation of the Western or Crossover Corridors in approximately double the area of reduced Scenic Integrity for the Central Corridor." The Western Corridor jeopardizes existing High Scenic Integrity of the area. The Central Corridor also impacts the HSI of the area, however HSI has already been degraded along much of the corridor by existing human development. The Western Corridor also passes through "distinctive landscape" for 4 times the length of the Central Corridor (21.2 miles versus 5.4 miles, respectively) and more than 9 times the length of USFS Scenic Class 1 landscape (10.5 miles versus 1.8 miles, respectively). The Central Corridor was quoted as being "intermittently visible" to the area residents and thus will not be a contiguous presence to the affected communities.

8 The acreage of vegetation communities impacted for each of the Management Indicator Species is greater for each vegetation community in the Western and Crossover Corridors than in the Central Corridor. Less wildlife will be displaced by disturbance or alterations along the Central Corridor. "The Western Corridor has the highest potential for adverse effects to special status species." Ten species listed under the ESA could potentially be affected by the construction and maintenance of the Western Corridor versus 7 listed species in the Central Corridor. When given a choice, impacting the lesser number of listed species is the more practical alternative. "The Western Corridor crosses a portion of the Sycamore Canyon watershed upstream of Critical Habitat for Sonora chub." Even though groundwater pollution and soil erosion are expected to be minimal and temporary, there is a possibility of serious, long-term damage that could affect the critical habitat of the Sonora chub. That is not a risk worth taking and could have legal consequences.

9 The potential for a higher density of cultural resource sites along the Central Corridor has been addressed by the construction of the EPNG pipeline. Surveys have not yet been conducted in detail along the Western and Crossover Corridors, however 3 to 4 times more previously identified archaeological and historical sites have been documented in the Western and Central Corridors (22 and 27, respectively) than in the Central Corridor (6). Native American communities/tribes/nations have already stated a preference for the Central Corridor listing lack of surveys along the Western and Crossover Corridors, presence of culturally significant plants and animals, and the current status of the area as "one of the few areas still existing in southern Arizona where the pre-European contact landscape can be encountered" as reasons for their preference.

Comment No. 4

As discussed in Section 4.12.2, access to the Central Corridor would be on existing utility maintenance roads which would require extensive upgrades, ranch access roads and trails, and new access ways where no access currently exists.

This EIS relies on pre-existing information and surveys to the extent practicable, and newly obtained information where necessary, to evaluate the environmental impacts of each of the proposed project alternatives.

Comment No. 5

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze potential impacts to these resources from the proposed project, including potential impacts from the use of helicopters along the three proposed alternative corridors.

Comment No. 6

Sections 4.3.2, Vegetation and Wildlife, and 4.3.4, Migratory Birds and Raptors, of the Final EIS have been revised to include analyses of the potential effects of explosives blasting. In addition, a mitigation measure has been added to the EIS (see Section 2.2) stating that no blasting would occur during peak breeding times for migratory birds (April through August) to minimize the impacts to migratory birds. The effects of blasting are unlikely to lead to a downward population trend or loss of population viability for any wildlife or migratory bird populations occurring in the project area.

Specific information on where explosives blasting would be required is pending final siting of the transmission line, which would occur only after issuance of a ROD by each Federal agency (if an action alternative is selected for implementation).

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- 10 The Draft EIS has addressed and excused as negligible property-owners' concerns about the potential decline of property values if the Central Corridor is established. Effects of long term EMF exposure along the Central Corridor was also excused as negligible and the corridor will be positioned at a safe distance from the EPNG pipeline.
- 11 Temporary construction noise along the corridor is just that, temporary. That will go away. Temporary construction noise and the presence of humans and machines will have a greater impact on wildlife along the Western and Crossover Corridors than along the Central Corridor. The statement "long term noise from the corona effect on transmission lines would generally be lost in background noise" from the Draft EIS addresses noise affecting the human population, but long term noise from the corona effect will add to "background noise" (is there any now?) of the Western and Crossover Corridors rather than being "lost" in it as it would along the Central Corridor. If there is currently no background noise in the Coronado National Forest, then the noise from the transmission lines along the Western and Crossover Corridors will become a new source of background noise. Operational noise after construction is completed (corona and maintenance, specifically) has greater negative impact in a pristine area unaccustomed to human produced noise.
- 12 According to an e-mail included in the EIS from Maj. David Von Brock, the Western Corridor poses potential impacts on military airspace and missions that the Central Corridor would not.
- 13 The issue of drug trafficking and illegal aliens should also be considered when making the final corridor decision. Tom Raffanella of the DEA responded to the issue in his correspondence by saying that the removal of plants and construction of the ROW "would be a concern of the DEA, in that it would help facilitate border crossings by drug traffickers and illegal immigrants." Would illegal alien traffic be more likely to follow a power line that at its closest is 5 miles west of an interstate highway? The Western Corridor, going through the remote areas of the Coronado National Forest and state lands, has the potential to draw more illegal alien traffic to the area than the Central Corridor which would be located in relatively flat, developed areas. An increase in illegal alien traffic along an established Western Corridor would not only create additional environmental and recreational impacts from trash, pedestrians, and vehicles, but also from response of law enforcement agencies including the US Border Patrol, Customs and DEA personnel.
- 14 Another issue that was not addressed was the potential fire risk in each of the corridors with and without the transmission lines, and the additional disturbance associated with fire fighting activities in response to perceived fire risks. Would the potential for fire increase with the addition of the power lines, thus increasing disturbance by fighting fires that were started by conditions brought about by the transmission lines? The EIS did mention that "smoke is a conductor of electrical current" and that "firefighters would monitor smoke near the transmission line for possible fire starts outside fire perimeter" so smoke near the transmission lines is a potential second source of ignition. What are the

Comment No. 7

Sections 3.1 and 4.1 present a description of the existing land use and analyze the potential impacts to these resources from the proposed project.

Comment No. 8

Sections 3.3.5 and 4.3.5 present a description of the existing MIS and analyze the potential impacts to these species from the proposed project. The proposed project is not expected to result in any downward population trends for MIS in any of the alternative corridors.

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- 14
cont. | chances that a fire could be ignited by the energy dispersal associated with electrical currents traveling the transmission line?
- 15 | What happens if the other agencies involved in the planning process select a different preferred alternative to the one the DOE and TEP selected?
- 16 | In conclusion, recognizing that TEP is obligated to go ahead with this project, I highly recommend and strongly urge TEP to erect the transmission line along the proposed Central Corridor. The Draft EIS itself outlines the reasons why the Central Corridor should be the preferred alternative. Any use of the Western Corridor, even for the Crossover alternative, would result in construction challenges including increased material costs and survey (geological, biological, and cultural) expenses; higher maintenance costs; greater detrimental impacts to geological, biological and cultural resources; greater interference with special interest groups (e.g. recreationists, military activities), and the potential for an increase in additional disturbance due to illegal alien activity and potential fire risks. The Crossover Corridor should not be considered a viable alternative at all. It runs the longest route through pristine areas and has added costs and detrimental biological and cultural impacts. The Central Corridor will require fewer materials, will be easier and cheaper to construct and maintain, and will be located in an area that is already developed.
- 17 | Prevention measures to avoid soil erosion, including use of vegetation and substrates for soil stabilization, should be exercised during construction in any corridor that is chosen.

Thank you for the opportunity to comment and provide input.



Comment No. 9

Although the EPNG pipeline may have damaged the archaeological sites through which it was constructed, the proposed TEP transmission line in the central corridor would not be located directly on the EPNG pipeline for safety reasons. The central corridor right-of-way is ¼ mile wide, and the transmission line could impact potentially previously undisturbed areas. To deal with this issue, Federal agencies are preparing a Programmatic Agreement with the Arizona State Historic Preservation Office (SHPO), interested tribes, and TEP guiding the treatment of cultural resources if any of the action alternatives is selected.

Comment No. 10

The Federal agencies have not attempted to assess potential impacts to property values from the proposed project because it would be speculative.

Sections 3.10 and 4.10 present analyses of the potential human health impacts of EMF exposure. Appendix B presents a study conducted by the NIEHS to determine if exposure to EMF may cause or promote adverse health effects. The available data have not revealed any conclusive evidence that EMF exposure from power lines poses a hazard to animal or human health (see Sections 3.10 and 4.10, Health and Human Environment).

Comment No. 11

Sections 3.9 and 4.9 discuss the existing noise and analyze the potential impacts from noise resulting from the proposed project, including potential noise impacts to wildlife.

Comment No. 12

As discussed in Chapter 10 and Appendix A of the Final EIS, consultation with the Air Space Manager of the Davis Monthan Air Force Base has been initiated. Information on the proposed project has been forwarded to the 162nd FG Airspace Manager for their review on how it may impact their military flight operation. The 162nd FG Airspace Manager was added to the

Comment No. 12 (continued)

Draft EIS distribution mailing list and a copy of the Draft EIS has been sent for their review and comment, but no comment was provided on the proposed project.

Comment No. 13

The Federal agencies have revised Sections 4.1.1, Land Use; Section 4.12, Transportation; and Chapter 5, Cumulative Impacts of the Final EIS based on the U.S. Border Patrol's response (USBP 2004) to the Federal agencies' request regarding illegal immigration and law enforcement activities in the proposed project vicinity. The U.S. Border Patrol's response generally reinforced the information on which the relevant analysis in the Draft EIS was based. The U.S. Border Patrol stated that the roads associated with the construction and maintenance of the proposed project would contribute to an increase in illegal immigrant and narcotic smugglers in the area and affect U.S. Border Patrol operations. The effects of these activities are reflected in the Final EIS in the sections listed above.

Comment No. 14

The following discussion on the potential for fire within the Coronado National Forest has been added to Section 4.1.1 of the Final EIS:

The lands traversed by the proposed power line are typified by low fire occurrence from natural ignition sources. Human caused fires occur at a more frequent rate in the area immediately west of Nogales, Arizona, and south of the Ruby Road (State Highway 289).

Impacts to the power line from natural fires are expected to be minimal. This assessment is based on several factors. The first issue of consideration is the low frequency of natural ignitions. The second factor is that the primary carrier fuel is grass which would result in low to moderate flame heights. A rapid dispersal of smoke could also be expected since there would be minimal smoldering of material after the passage of the fire front. Natural ignitions (lightning) are also frequently associated with light to moderate rainfall which would also temper the impacts from this source.

Comment No. 14 (continued)

Human caused fires in the Nogales area, and other areas of public travel are of somewhat greater concern because of the increased number of starts and the fact that these ignitions occur without the benefit of rainfall. Again, due to grass being the primary carrier fuel, significant impacts are not expected to the proposal.

Although heat from natural and man caused fires is not anticipated to be an impact to the power line corridor, smoke from a fire as small as several acres could generate enough concern to cause arcing problems. Smoke from wildfires is known to cause arcing if it becomes dense enough. This creates a significant hazard to firefighters attempting to suppress the fire. There is also a potential risk to the power line itself and adjacent structures. During the summer of 2004, power lines of a similar nature to the proposal were shut down while crews conducted burnout operations on the Willow Fire north of Phoenix, Arizona. During the same time period, a power line crossing the Coconino National Forest was also shut down for a brief period while crews completed burnout operations along the power line right-of-way. Similar shutdowns could be expected for power lines associated with the TEP Proposal.

At the present time, the majority of the power line proposal lies in areas where we are not likely to conduct prescribed burning. The Forest has not identified the area associated with the power line as needing immediate fuels treatment. One exception would be the area associated with Potrero Canyon in the vicinity of the Gateway Substation. This area is currently being treated as a Wildland Urban Interface area with values at risk relating to the adjacent private land subdivisions. The initial fuels reduction treatment in this area is scheduled for completion in 2005. Future treatment options will be necessary to further reduce the risk to private land development and the planned power line and substation.

Comment No. 15

As discussed in Section 1.6.6, if there is a lack of agreement on the decision among the Federal agencies involved in the process, i.e., if TEP ultimately does not receive the unanimous consent all Federal agencies and the State of Arizona to build along the same corridor, this proposed project will have been rendered infeasible and could not proceed as described in the EIS.

Comment No. 16

While the Central Corridor remains a viable alternative for selection by the Federal decisionmakers in their respective RODs (see Section 1.6.6), implementation of the proposed project in the Central Corridor could not occur until TEP meets all regulatory requirements, including obtaining the necessary approval from the ACC.

Comment No. 17

Refer to Sections 3.6 and 4.6, Geology and Soil Resources, for a discussion of erosion and sedimentation.

Lane, Dianne
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Comment No. 1

The alternative or renewable power supply methods cited by the commentor do not meet the purpose and need of the proposed project (see Section 2.1.5).

SEP-17-2003 16:30	P.01
<p>To: Dr. Jerry Pell, Office of Fossil Energy From: Dianne Lane 6420 Berwickshire Way San Jose, CA 95120 408-268-7906 Date: September 16, 2003 Subject: Proposed Tucson Electric Power Company</p>	
<p>Although I received the CD with the entire Draft EIS, for some reason I am only able to pull up the summary on my computer. Therefore I have no specific information on the environmental impact of the proposed plant and lines on the air, wildlife, agriculture or residents.</p>	
1	<p>My question, however, is why any new power plant proposed in 2003 would be built using 19th century technology. Corporations profiting in the past from fossil fuels should be looking to the future with renewable energy source (wind and sun found in abundance in southern Arizona). In the long run this would be cheaper, more profitable and have less impact on the environment.</p>
TOTAL P.0	

Lazar, Brenda
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Brenda Lazar
7077 Mission Hill Lane
Tucson, Az. 85718

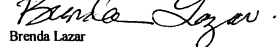
Sue Kozacek
Acting Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, Az. 85706

Dear Ms. Kozacek,

1 I am writing to urge you to deny the special use permit for the Preferred Route for the Tucson Electric
2 Power Sahuarita-Nogales Transmission line DEIS. I live in the area and my family and I enjoy the
3 outdoors on a daily basis. We live here for the beautiful environment. The proposed powerline would
totally disrupt the Tumacacori and Atascosa Mountain area's beautiful views, let alone the wildlife that
would be disturbed by the road building proposed. This power line is unneeded and its only reason would
be for the power company to make profits by selling power to Mexico. For this, we should not destroy our
most precious asset, our natural beauty and landscapes.

Thank you for your consideration.

Sincerely,


Brenda Lazar

Comment No. 1

Sections 3.1 and 4.1 present a description of the existing land use, and analyze the potential impacts to these resources from the proposed project.

Comment No. 2

Sections 3.1.2 and 4.1.2 present a description of the existing recreational opportunities and analyze the potential impacts to these resources from the proposed project.

Sections 3.2 and 4.2 present a description of the existing visual resources, and analyze the potential impacts to these resources from the proposed project, including potential impacts to Tumacacori and Atascosa Mountains.

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources. Sections 3.3.1 and 4.3.1 of the Final EIS have been revised to include the additional information regarding habitat fragmentation, specifically with respect to roads and linear corridors such as those associated with the proposed project.

Comment No. 3

The ACC is vested with the state's authority to decide how it believes energy should be furnished within Arizona's borders (for example, the need for and effectiveness of transmission lines within its borders). Refer to ACC, Comment 1, and to the revised text in Section 1.1.2, The Origin of TEP's Proposal: TEP's Business Plan and the Proceedings of the Arizona Corporation Committee, that provides explanation of the jurisdictions and authorities of the state and Federal agencies, and their relationship to this NEPA analysis.

Potential economic benefit to TEP from the proposed project is outside the scope of the EIS.

Lazar, Brenda
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Brenda Lazar
7077 Mission Hill Lane
Tucson, Az, 85718

Dr. Jerry Pell
Office of Fossil Energy
U.S. Dept. of Energy
Washington D.C.

Dear Dr. Pell,

1 I am writing to ask you to consider issuing a Supplemental Draft Environmental Impact Statement regarding the Tucson Electric Power Sahuarita-Nogales Transmission line DEIS. I live and enjoy the area in question, and I am outraged that the local power company might be allowed to destroy our environment to build an UNNEEDED, expensive, damaging power line through this sensitive area so it can make more profit. A much smaller line would be sufficient and would serve the long time needs of the area. I do not think the power company needs to or should build this huge line to sell power to Mexico from Tucson.

Thank you for your consideration.

Sincerely,


Brenda Lazar

Comment No. 1

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system..." In an applicant-initiated process, such as TEP's proposed project, the range of reasonable alternatives analyzed in detail in the EIS is directly related to the applicant's purpose and need.

A smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

Potential economic benefit to TEP from the proposed project is outside the scope of the EIS.

Levick, Lainie

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TEP Sahuarita-Nogales Transmission line DEIS
From: lrl6454 [SMTP:lrl6454@comcast.net]
To: Pell, Jerry
Cc:
Subject: TEP Sahuarita-Nogales Transmission line DEIS
Sent: 10/13/2003 10:47 PM
Importance: Normal

Dr. Jerry Pell
Office of Fossil Energy
U.S. Department of Energy
Washington D.C. 20585

Dear Dr. Pell,
Please accept the following as my comments on the Draft
EIS for the Tucson

Electric Power Sahuarita-Nogales Transmission Line.
I am strongly opposed to any alternative that would build
this unnecessary power line. I support the No Action
Alternative for these reasons:

-This power line is not needed, and would not benefit Santa
Cruz County.
- Both the Western and Crossover Routes would severely
impact the wilderness proposal for the Tumacacori
Highlands. This proposal was being developed long before
this power line proposal was presented, and would protect
one of the largest remaining roadless areas in the Southwest.
Numerous threatened, endangered, and special status
species depend on these lands. A power line with its
associated roads would fragment and degrade the habitat.

Comment No. 1

The ACC is vested with the state's authority to decide how it believes energy should be furnished within Arizona's borders (for example, the need for and effectiveness of transmission lines within its borders). Refer to ACC, Comment 1, and to the revised text in Section 1.1.2, The Origin of TEP's Proposal: TEP's Business Plan and the Proceedings of the Arizona Corporation Committee, that provides explanation of the jurisdictions and authorities of the state and Federal agencies, and their relationship to this NEPA analysis.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to the resources, including threatened, endangered and special status species.

Comment No. 2

A smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal and, therefore, is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Levick, Lainie

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- 1
cont. | - This transmission line does not serve the real needs of the
citizens of the region. I urge you to withdraw this DEIS and
re-issue a new one that addresses the real power needs of
2 | Santa Cruz County with a small, locally run power plant, or a
smaller power line that uses existing power line routes and
infrastructure.

Thank you for the opportunity to provide these comments for
your consideration.

Sincerely,
Lainie Levick
12120 E. Snyder Road
Tucson, AZ 85749

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Forwarded by Susan K Kozacek/R3/USDAFS on
10/09/2003 06:51 PM -----
kliston@oceana.org
10/09/2003 04:38 PM

To: skozacek@fs.fed.us
cc:
Subject: Environmental Impact Statement for Tucson
Electric Power's proposed 345 kilovolt powerline

Ms. Sue Kozacek
Coronado National Forest
Federal Building, 300 West Congress
Tucson, AZ 85701

Dear Ms. Kozacek,

1 I am writing to urge you to withdraw the current draft
Environmental Impact Statement for Tucson Electric
Power's proposed 345 kilovolt powerline.

2 TEP's proposed "Western Route" and alternative "Crossover
Route" would carve through some of the most remote and
wild areas in Southeast Arizona, forever scarring the
beautiful and irreplaceable landscape of the Tumacacori
Highlands. This area contains several roadless areas as well
as a citizen's proposed Wilderness area home to black bears,
Mexican spotted owls, lesser-long nosed bats and peregrine
falcons as well as lesser known species such as the Sonora
chub, Mexican vine snake, elegant trogon and the Gentry
indigo bush. A jaguar was sighted in this area only two
years ago.

Comment No. 1

The commentor's opinion that the Draft EIS should be withdrawn is noted.

Comment No. 2

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

Comment No. 3

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system....." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

Liston, Kamie
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3 The important goal of providing fully reliable electrical service to the city of Nogales and Santa Cruz County must be achieved. Unfortunately, instead of building the small transmission line necessary to achieve this goal, TEP has proposed a massive, environmentally destructive, and extremely controversial powerline designed to export power to Mexico.

4 The draft EIS is clearly inadequate, because it does not address important alternatives to TEP's powerline which would provide reliable service without destroying our environmental and cultural heritage, and which would not require huge increases to consumers' electricity bills.

5 The recent blackout in the Northeast is an urgent reminder that our energy policy should be based on serving the public interest, not corporate private profits. I urge DOE to issue a new draft EIS which fully and rigorously explores all available options-including a local power plant and smaller power lines which would not serve Mexico-to meet the important public interest of providing reliable energy service to Santa Cruz County.

6 We must take the opportunity to protect what we can not change back. Please do not mar this landscape with power lines, while trying to meet energy needs.

Sincerely,

Kamie Liston
PO BOX 20252
Juneau, Alaska 99802

Comment No. 4

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 5

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Comment No. 6

The ACC is vested with the state's authority to decide how it believes energy should be furnished within Arizona's borders (for example, the need for and effectiveness of transmission lines within its borders). Refer to the revised text in Section 1.1.2, The Origin of TEP's Proposal: TEP's Business Plan and the Proceedings of the Arizona Corporation Committee, that provides explanation of the jurisdictions and authorities of the state and Federal agencies, and their relationship to this NEPA analysis.

Sections 3.1 and 4.1 discuss of the existing land use and analyze the potential impacts to these resources from the proposed project. Section 4.3.2 states that the long-term reductions in biological activity (e.g., lack of vegetation in an area due to construction traffic) tend to be more pronounced in arid areas such as the proposed project area where biological communities recover very slowly from disturbances.

Loe, Steve
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From: stevealoe@msn.com
Sent: Friday, October 17, 2003 10:36 PM
To: Pell, Jerry
Subject: Environmental Impact Statement for Tucson
Electric Power's proposed 345 kilovolt powerline

Dr. Jerry Pell
U.S. Department of Energy, Office of Fossil Energy (FE-27)
1000 Independence Avenue. SW
Washington, DC 20585

Dear Dr. Pell,

I am a former Forest Biologist of the Coronado National Forest. I served on the Forest from 1978-1980. During this time, I had the pleasure of working in this biologically rich area.

1 I am writing to urge you to withdraw the current draft
Environmental Impact Statement for Tucson Electric
Power's proposed 345 kilovolt powerline.

2 TEP's proposed "Western Route" and alternative "Crossover
Route" would carve through some of the most remote and
wild areas in Southeast Arizona, forever scarring the
beautiful and irreplaceable landscape of the Tumacacori
Highlands. This area contains several roadless areas as well
as a citizen's proposed Wilderness area home to black bears,
Mexican spotted owls, lesser-long nosed bats and peregrine
falcons as well as lesser known species such as the Sonora
chub, Mexican vine snake, elegant trogon and the Gentry
indigo bush. A jaguar was sighted in this area only two
years ago.

Comment No. 1

The commentor's opinion that the Draft EIS should be withdrawn is noted.

Comment No. 2

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

Comment No. 3

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system..." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

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3 The important goal of providing fully reliable electrical service to the city of Nogales and Santa Cruz County must be achieved. Unfortunately, instead of building the small transmission line necessary to achieve this goal, TEP has proposed a massive, environmentally destructive, and extremely controversial powerline designed to export power to Mexico.

4 The draft EIS is clearly inadequate, because it does not address important alternatives to TEP's powerline which would provide reliable service without destroying our environmental and cultural heritage, and which would not require huge increases to consumers' electricity bills.

5 The recent blackout in the Northeast is an urgent reminder that our energy policy should be based on serving the public interest, not corporate private profits. I urge DOE to issue a new draft EIS which fully and rigorously explores all available options-including a local power plant and smaller power lines which would not serve Mexico-to meet the important public interest of providing reliable energy service to Santa Cruz County.

6 I urge you to make sure the alternatives of placing this development in existing disturbed corridors are fully explored and do not risk creating intrusion into roadless, pristine areas.

Sincerely,

Steve Loe
12569 FIFTH ST.
Yucaipa, California 92399

Comment No. 4

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 5

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Comment No. 6

Section 1.2 explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review

Comment No. 6 (continued)

alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the existing roads and IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts related to roads.